

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

Gregory S. Bulsak	:	Case No.12-24255GLT
Regina S. Bulsak	:	Chapter 13
Debtor(s)	:	
Gregory S. Bulsak	:	
Regina S. Bulsak	:	Re Doc.122
Movant(s)	:	
vs.	:	
CitiMortgage Inc, AAS Debt Recovery,	:	
AFNI Inc, American InfoSource LP.,	:	Hearing Date 4/19/2017
Asset Acceptance LLC, BAC Home	:	
Loans Servicing LP, Bank of America NA:	:	
Cavalry Portfolio Services Chrysler	:	
Capital, CitiMortgage Columbia House	:	
DVD Club, Credit Management	:	
Company, Creditech, Discover Bank	:	
Discover, Enhanced Recovery Company,	:	
LLC, Exeter Finance Corporation,	:	
Insolve Recovery LLC, Jefferson	:	
Capital Systems LLC, LVNV Funding,	:	
Midland Funding LLC, Northern	:	
Resolution Group, Palisades Acquisition	:	
IX, LLC, Palisades Collections LLC,	:	
Pennsylvania American Water, Peoples	:	
Natural Gas Co, LLC, Plains Commerce	:	
Bank, PNC Bank, US Department of	:	
HUD, Verizon, West Penn Power,	:	
And Ronda J. Winnecur, Trustee	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION TO OBTAIN VEHICLE FINANCING

Ronda J. Winnecur, Chapter 13 Trustee, respectfully represents the following:

1. The Debtors request approval for post-petition financing to purchase a new vehicle for an amount of \$28,000.00.
2. The Trustee objects to the motion in that a replacement vehicle can be purchased for an amount not to exceed \$25,000.00 or \$450.00 monthly. Such will afford the Debtor fair and adequate transportation.

3. Furthermore, according to the Trustee's records, the Debtors are in arrears in the amount of \$22,636.72 including April.
4. The Trustee is in receipt of insurance proceeds from the loss of the debtors' prior vehicle. Those funds total \$15,812.77. If the debtors chose to dedicate those funds to the plan, the arrearages would be reduced.
5. The wage remittance has ceased, but Trustee is under the impression that wife has found replacement employment. Still, only four (4) months remain in the plan term, and debtors' ability to complete the plan is questionable.
6. Therefore, another secured debt payment appears to be not feasible for the Debtors.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: 04/03/17

by /s/ Jana S. Pail  
Jana S. Pail - PA I.D. #88910  
Attorney for Trustee  
US Steel Tower – Suite 3250  
600 Grant St.  
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Pennsylvania American Water, Peoples	:	
Natural Gas Co, LLC, Plains Commerce	:	
Bank, PNC Bank, US Department of	:	
HUD, Verizon, West Penn Power,	:	
And Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

CERTIFICATE OF SERVICE

I hereby certify that on the 3<sup>rd</sup> of April 2017, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Suite 970, Liberty Center  
1001 Liberty Avenue  
Pittsburgh PA. 15222

Gregory and Regina Bulsak  
1819 Renee Drive  
South Park PA 15219

Matthew Herron, Esquire  
1701 Grant Building  
Pittsburgh PA 15219

/s/Dianne DeFoor  
Office of Chapter 13 Trustee  
US Steel Tower – Suite 3250  
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